## <u>REMARKS</u>

Claims 1 - 39 are pending. Claims 1 - 39 have been amended. No new matter has been introduced. Reexamination and reconsideration of the application are respectfully requested.

In the May 7, 2003 Office Action, the Examiner rejected claims 1 - 39 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,546,572 to Seto et al. (the Seto reference). This rejection is respectfully traversed.

The present invention is directed to a method, system, and program for the retrieval of a hair style graphic image of an impression or sensuous image meeting with an impression or sensuous image of a retrieval word from among a plurality of hair style graphic images. An image map generating process generates a graphic image map. A file for storing the content of the graphic image map is generated in the graphic image map storage device. A document number is read out from the leading record of the descriptive document table. The graphic image descriptive document corresponding to the read out document number is read out from the descriptive document table. An expression word is extracted which is the same as the expression word registered in the expression word map from the read out graphic image descriptive document.

Coordinates of the extracted expression word in a virtual space are derived, with reference to the expression word map. The respective hair style graphic image data, e.g., jpg01 to jpg09, is arranged on the virtual space. The read out document number and the coordinates derived in the virtual space are registered in a graphic image map.

A retrieving process for retrieving the hair style graphic image having an impression meeting with the impression of the retrieving word from the graphic image

storing device includes a retrieving word being input from an input device. A file for recording the content of the retrieving result table is generated in the graphic image storage device. Coordinates of the input retrieving word are derived from the virtual space. The coordinates of the leading record of the graphic image map in the virtual space are read out. A distance between the coordinates of the derived retrieving word in the virtual space and the coordinates of the read out hair style graphic image data in the virtual space is derived. A distance between the coordinates of all the hair style graphic image data (jpg01 to jpg09) is made. The derived results are sorted in ascending order. A retrieval result table is formed with each hair style graphic image jpg01 to jpg09 registered in each record, the records being sorted in ascending order. The retrieval result is displayed on the display device utilizing the retrieval result table.

A method for retrieving a retrieval object of an impression meeting with an impression of a retrieving word among a plurality of retrieval

pre-storing an expression word map, in which a plurality of
expression words expressing impressions of retrieval objects are arranged
on a virtual space depending upon a degree of association of the
impressions,

pre-storing said plurality of retrieval objects;

Independent claim 1, as amended, recites:

objects, comprising:

deriving a position of the expression word corresponding to said retrieval object or the position of the expression word contained in said retrieving object on said virtual space, generating a retrieval object map arranging said plurality of retrieval objects on said virtual space on the basis of the position of the corresponding expression word,

deriving a position of said retrieving word on said virtual space with reference to said expression word map, and

retrieving the retrieval object of the impression meeting with the impression of said retrieving word among said plurality of retrieval objects on the basis of the position of said retrieving word with reference to said retrieval object map.

The Seto reference is directed to a method for retrieving image information. An object name is inputted from a workstation to automatically retrieve the longitude and latitude of an object by using an object table shown in Fig. 10. For example, the input may be an airport name and the response will be either "No Object" or the longitude and latitude of the airport name. If there is an image corresponding to the entered object name, retrieved object information such as name, latitude, longitude area size, etc., is displayed at the workstation. The user selects an object image and the latitude and longitude of the selected image are output.

An image identification number is retrieved from an image table using the longitude and latitude of the selected image. The image table stores a sensor name, sensed data, the latitudes and longitudes of the four corners of a sensed image, a path name, a satellite name, an area name, and an image identification number. When the latitude and longitude are inputted, an inclusion relationship is checked to determine whether the inputted latitude and longitude are within the latitudes and longitudes of the

four corners of each sensed image, which thereby retrieves the image identification number and image information. The image identification number and image information for the latitude and longitude supplied from the object table are retrieved and output. An object image is selected from the retrieved candidate images. The image information of the retrieved candidate images are displayed at a workstation and labeled as an intermediate output. The user selects an object image while observing the displayed information. The selected image identification number and related information are then outputted to the workstation. An area of 512 by 512 pixels is cut out, with the object image being placed at the center of the area, and is processed for display on the screen of the image display unit. (Col. 9, line 67 - col. 11, line 35; Figs. 10, 11, 12, and 13).

The Seto reference does not disclose, teach, or suggest the method of independent claim 1, as amended. Unlike the method of independent claim 1, as amended, the Seto reference does not show a method for retrieving a retrieval object of an impression meeting with an impression of a retrieving word among a plurality of retrieval objects, including: pre-storing an expression word map, in which a plurality of expression words expressing impressions of retrieval objects are arranged on a virtual space depending upon a degree of association of the impressions, pre-storing said plurality of retrieval objects; deriving a position of the expression word corresponding to said retrieval object, generating a retrieval object map arranging said plurality of retrieval objects on said virtual space on the basis of the position of the corresponding expression word, deriving a position of said retrieving word on said virtual space, and retrieving the retrieval object of the impression meeting with the impression of said

retrieving word.

Instead, the Seto reference discloses pre-storing of an object table where locations, i.e., objects, are stored in a record including, for example, the object name (such as an airport), longitude reading for object name, latitude reading for object name, the size of the object name, and the construction data of the object name. (Col. 10, lines 2 - 32). This is not the same as a method for retrieving a retrieval object of an impression meeting with an impression of a retrieval word including pre-storing an expression word map, in which a plurality of expression words expressing impressions of retrieval objects are arranged on a virtual space depending upon a degree of association of the impressions because the Seto reference's records detail a physical location and other factual information for an object, but do not include or describe expression words, such as neat, smooth, etc. Nor are the Seto reference's records arranged on a virtual space because these records are arranged according to longitude and latitude while the present invention's expressions words are arranged on a virtual space. Accordingly, applicant respectfully submits that independent claim 1, as amended, distinguishes over the Seto reference.

Independent claim 1, as amended, further distinguishes over the Seto reference.

Unlike the method of claim 1, the Seto reference does not disclose a method for retrieving retrieval object of an impression meeting with an impression of a retrieving word among a plurality of retrieval objects, including: pre-storing an expression word map, pre-storing said plurality of retrieval objects; deriving a position of the expression word, generating a retrieval object map arranging said plurality of retrieval objects on said virtual space on the basis of the position of the corresponding expression word,

deriving a position of said retrieving word on said virtual space, and retrieving the retrieval object of the impression meeting with the impression of said retrieving word.

Instead, the Seto reference discloses generating an image or images that inclusive of a particular object, such as an airfield. These images can be retrieved directly from position information, i.e., if a longitude and latitude of the particular object. such as an airfield, are in a defined area (such as a defined rectangle or polygon as defined by query expressions), then the images are retrieved. This is not the same as retrieving a retrieval object of an impression meeting with an impression of a retrieving word among a plurality of retrieval objects, including generating a retrieval object map arranging said plurality of retrieval objects on said virtual space on the basis of the position of the corresponding expression word because the Seto reference arranges its objects based on the object's longitude and latitude and not in a virtual space based on the position of the corresponding expression word. The Seto reference never discusses arranging the objects in virtual space based on the position of expression words, it only describes an image table including latitudes and longitudes, a path/row, a satellite name, an area name, and an image identification number. Accordingly, applicant respectfully submits that independent claim 1, as amended, further distinguishes over the Seto reference.

Independent claims 6, 11, 12, 15, 18, 22, 29, 34, and 37, all as amended, recite similar limitations to independent claim 1, as amended. Accordingly, applicant respectfully submit that independent claims 6, 11, 12, 15, 18, 22, 29, 34, and 37, all as amended, distinguishes over the Seto reference for the same reasons as discussed above in regards to independent claim 1, as amended.

Dependent claims 2 - 5, 7 - 10, 13 -14, 16 - 17, 19 - 21, 23 - 28, 35 - 36. and 38 - 39 depend, indirectly or directly, from independent claims 1, 6, 12, 15, 18, 22, 34, and 37, respectively. Accordingly, applicant respectfully submits that claims 2 - 5, 7 - 10, 13 - 14, 16 - 17, 19 - 21, 23 - 28, 35 - 36, and 38 - 39, distinguish over the Seto reference for the same reasons as discussed above in regards to independent claim 1, as amended.

Independent claim 32, as amended, recites:

A computer retrieving hair style graphic images of an impression meeting with an impression of a retrieving word from among a plurality of hair style graphic images, comprising,

a graphic image map storage device for pre-storing a graphic image map, the graphic image map including a plurality of hair style graphic images on a virtual space, where the virtual space is a coordinate system having a first axis and a second axis perpendicular to said first axis, depending upon a degree of association of the impressions,

said first axis is assigned for amount of sense of dynamic as quantified on one axial direction and amount of sense of smart as quantified on the other direction and

the second axis is assigned for amount of sense of masculine as quantified on one axial direction and amount of sense of femininity as quantified on the other direction.

The Seto reference does not disclose, teach, or suggest the computer of claim 32, as amended. Unlike the computer of independent claim 32, as amended, the Seto

reference does not disclose a computer retrieving hair style graphic images of an impression meeting with an impression of a retrieving word from among a plurality of hair style graphic images, including a graphic image map storage device for pre-storing a graphic image map, the graphic image map including a plurality of hair style graphic images on a virtual space, where the virtual space is a coordinate system having a first axis and a second axis perpendicular to said first axis, depending upon a degree of association of the impressions, said first axis is assigned for amount of sense of dynamic as quantified on one axial direction and amount of sense of smart as quantified on the other direction and the second axis is assigned for amount of sense of masculine as quantified on one axial direction and amount of sense of femininity as quantified on the other direction.

Instead, the Seto reference discloses an image table storing a sensor name, sensed data, the latitudes and longitudes of the four corners of the sensed image, a path/row, a satellite name, an area name, and an image identification number. (Col. 10, lines 44-48). This is not the same or even remotely close to a computer retrieving hair style graphic images of an impression meeting with an impression of a retrieving word from among a plurality of hair style graphic images, including a graphic image map including a plurality of hair style graphic image map, the graphic image map including a plurality of hair style graphic images on a virtual space because the Seto reference never mentions hair style graphic images. Because the Seto reference does not mention hair style graphic images, it would be impossible for the plurality of hair style graphic images to be part of a graphic image map on a virtual space.

Accordingly, applicant respectfully submits that independent claim 32, as amended,

distinguishes over the Seto reference.

independent claims 30 - 31 and 33, all as amended, recite similar limitations to independent claim 32, as amended. Accordingly, applicant respectfully submits that independent claims 30 - 31 and 33, all as amended, distinguish over the Seto reference for the same reasons as discussed above in regards to independent claim 32, as amended.

Applicant believes that the claims are in condition for allowance, and a favorable action is respectfully requested. If for any reason the Examiner finds the application other than in condition for allowance, the Examiner is requested to call either of the undersigned attorneys at the Los Angeles telephone number (213) 488-7100 to discuss the steps necessary for placing the application in condition for allowance should the Examiner believe that such a telephone conference would advance prosecution of the application.

Respectfully submitted,

PILLSBURY WINTHROP LLP

Date: August 7, 2003

Mark R. Kendrick

Registration No. 48,468

Attorney for Applicant(s)

Date: August 7, 2003

By: Roger R. Wise

Registration No. 31,204

Attorney For Applicant(s)

725 South Figueroa Street, Suite 2800

Los Angeles, CA 90017-5406 Telephone: (213) 488-7100

Facsimile: (213) 629-1033